

Petition for Determination of Necessity
and Public Convenience Pursuant to
G.L. c. 164, § 72 for TDK Properties, LLC.

Petition for Zoning Exemption Pursuant to
G.L. c. 40A, § 3 for TDK Properties, LLC.

D.T.E. 06-32

Pursuant to 220 CMR § 1.03, New England Power Company d/b/a National Grid (“NEP” or the “Company”) petitions the Department of Telecommunications and Energy (the “Department”) for permission to intervene as a full party in this proceeding. In support of its petition, the Company states the following:

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would help elucidate the issues in the proceeding. Western Massachusetts Electric Company, D.T.E. 01-36/02-20, at 6 (January 31, 2003).

5. NEP is substantially and specifically affected by this proceeding, because TDK Properties, LLC ("TDK") proposes to construct a 115 kV transmission line of approximately 1,250 feet in length in the City of Everett which will interconnect TDK's proposed generation facilities with a substation located in Everett and owned and operated by NEP. After completion of construction of the line, TDK plans to convey the line to NEP, which will then own and operate the line. TDK Petition for Determination of Necessity and Public Convenience, pp. 1-2. Furthermore, the proposed line is being designed, and its location determined, in conjunction with NEP, which is currently conducting a System Impact Study to analyze the design parameters for the interconnection. Id., p. 5. Given the extensive involvement of NEP in the proposed design and construction of the line, and NEP's ultimate ownership of the line, NEP will be substantially and specifically affected by the outcome of this proceeding.
6. NEP may also be substantially and specifically by this proceeding because TDK has requested a comprehensive zoning exemption for its proposed generating facilities as well as "ancillary facilities". TDK Petition for Zoning Exemption, p38. In its petition, TDK has requested exemption from the dimensional limitations in the City of Everett Zoning By-Laws that could limit the final design for the "interconnection facilities". Id., p. 11. Furthermore, it would appear that construction of the transmission line may be a prohibited use under the Everett Riverfront Overlay District. Id., p. 10. Presumably, these are references to the contemplated 115 kv transmission line for interconnecting the generator to the substation. Since NEP will be the ultimate owner and operator of the

line, it has a substantial interest in any zoning exemptions sought and/or granted that may affect the line as well as in any conditions that may be imposed in a grant of a zoning exemption.

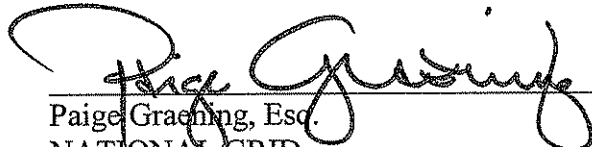
7. The evidence that NEP may present in this proceeding will help clarify issues concerning the transmission line and its relationship to the proposed generation facilities and be of benefit to the Department in establishing a complete record.

WHEREFORE, NEP requests that the Department grant its petition to intervene as a full party.

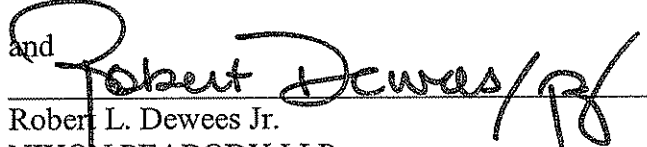
Respectfully submitted,

NEW ENGLAND POWER COMPANY

By its attorneys,



Paige Graehning, Esc.
NATIONAL GRID
25 Research Drive
Westborough, MA 01582

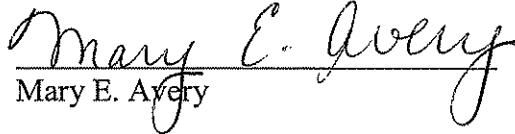
and 

Robert L. Dewees Jr.
NIXON PEABODY LLP
100 Summer Street
Boston, MA 02110

Dated: April 10, 2006

CERTIFICATE OF SERVICE

I hereby certify that on April 10, 2006 I delivered a copy of the attached Petition to Intervene of New England Power Company d/b/a National Grid to the attorneys of record for TDK Properties, LLC in D.T.E. 06-32 by electronic mail and first class mail, postage prepaid.


Mary E. Avery

Dated: April 10, 2006